

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: MAR 3 1987

SUBJECT: Immediate Removal at the I. J. Recycling  
Facility Site, Fort Wayne, Indiana - ACTION MEMORANDUM ADDENDUMFROM: Kenneth M. Theisen, On-Scene Coordinator  
Western Response Unit *K.M. Theisen*TO: Valdas V. Adamkus  
Regional Administrator  
*M.A. Soe*THRU: Basil G. Constantelos, Director  
*B* Waste Management Division

EPA Region 5 Records Ctr.



224017

PURPOSE

The purpose of this addendum is to clarify the project scope described in the approved action memorandum for the subject site dated November 3, 1986, (copy enclosed). Such clarification for the record will allow the disposal of a small quantity of toluene diisocyanate (TDI) which poses an unacceptable risk to the security of the site, and hence to public health and safety.

BACKGROUND

The removal action at the site commenced on November 3, 1986. The action included a general site stabilization in which over 3,000 drums of hazardous material were characterized and safely staged in a secure confined building awaiting disposal. The site was demobilized on December 1, 1986, except for daily security and a weekly inspection by the Emergency Response Cleanup Services contractor.

In the course of this action 42 5-gallon pails of TDI were encountered. These were overpacked into seven drums. The individual pails are old, rusted and of questionable structural integrity. TDI is a dangerous chemical that is water reactive, poisonous, and emits a poisonous gas upon combustion. It is not compatible with any of the groups of chemicals currently stored on the site. The overpacked drums of TDI are currently being stored in an isolated, unheated portion of an adjacent building on the site.

An action memorandum and a §106 unilateral order are in development for further activities at the site, but are hampered by the large amount of information which must be reviewed to identify further potential responsible parties.

*3/3/87*

RECOMMENDATION

The presence of TDI in a potentially unstable form poses a threat to the overall safety and security of the site. Prompt disposal of this material by incineration would alleviate this threat. This activity can be funded with monies available under the current project ceiling. Your concurrence with this clarification is recommended to allow such disposal.

APPROVAL:

*Frank M. Covington*  
*acting* REGIONAL ADMINISTRATOR

DATE: 3-3-87

DISAPPROVAL:

REGIONAL ADMINISTRATOR

DATE:

Attachment